

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	
Telecommunications Carriers Eligible to Receive Universal Service Support	WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization	WC Docket No. 11-42
Pinnacle Telecommunications Group, LLC	
Petition for Limited Designation as an Eligible Telecommunications Carrier	

Pinnacle Telecommunications Group, LLC COMPLIANCE PLAN

Pinnacle Telecommunications Group, LLC ("PINNTEL" or the "Company"),¹ hereby respectfully submits and requests expeditious approval of its Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.²

PINNTEL is submitting this Compliance Plan in order to qualify for blanket forbearance from the facilities requirement of section 214(e)(1)(A) of the Communications Act and participate as an eligible telecommunications carrier ("ETC") in the Lifeline program.³

¹ PINNTEL reports its corporate and trade names, and its holding company, and affiliates in Exhibit A.
² See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, *WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012)* ("Lifeline Reform Order").
³ PINNTEL qualifies for and seeks to avail itself of the Commission's grant of forbearance from the facilities requirement of the section 214(e)(1)(A) for purposes of the federal Lifeline program, PINNTEL reserves the right to show any state commission that it provides service using its own facilities for the purpose of collecting state universal service funding under state rules. PINNTEL will follow the requirements of the Commission's Lifeline rules and this Plan in all states in which provides Lifeline service and receives funds.

PINNTEL will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission's Lifeline rules and policies. This Compliance Plan will describe the specific measures that PINNTEL intends to implement to achieve the objectives of the *Lifeline Reform Order*. This Compliance Plan: (1) describes the specific measures that PINNTEL will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures PINNTEL will follow in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the low income fund, materials related to initial and ongoing certifications and sample marketing materials; and (2) provide a detailed description of how PINNTEL will offer Lifeline services, the geographic areas in which it will offer services, and a detailed description of PINNTEL's Lifeline service plan offerings.

ACCESS TO 911 AND E911 SERVICES

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon PINNTEL: (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; and (2) providing its Lifeline subscribers with E911 compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.⁴ PINNTEL will comply with these conditions.

PINNTEL customers will have access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all PINNTEL customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from PINNTEL

⁴See Lifeline Reform Order, ¶ 373.

handsets, even if the account associated with the handset has no minutes remaining.

PINNTEL utilizes Sprint and Verizon Wireless as its underlying network providers. Sprint and Verizon Wireless route 911 calls from PINNTEL's customers in the same manner as 911 calls from Sprint and Verizon Wireless' own retail customers. To the extent that Sprint and Verizon Wireless are certified in a given PSAP territory, 911 capabilities will be the same for PINNTEL customers. PINNTEL will transmit all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

E911-Compliant Handsets. PINNTEL will ensure that all handsets used in connection with its Lifeline service offering will be E911-compliant. PINNTEL uses FCC compliant new and refurbished handsets purchased from various entities, including affiliates. Pre-owned phones undergo a thorough quality inspection by PINNTEL prior to being distributed to customers. All PINNTEL handsets are required to meet PINNTEL's and its carriers minimum handset specifications, which ensure that the handset models used meet all 911 and E911 requirements. Any new customer that qualifies for and enrolls in PINNTEL's Lifeline program is assured of receiving a 911/E911 compliant handset.

COMPLIANCE PLAN

I. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE

A. Policy

PINNTEL will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules (when it becomes effective on June 1, 2012), as well as any additional certification and verification requirements for Lifeline eligibility in states where PINNTEL is designated as an ETC.

All subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new sections 54.409(a)(2) or 54.409(a)(3) of the Commission's rules. Through the certification requirements described below, PINNTEL will confirm that the subscriber is not already receiving a Lifeline service and that no one else in the subscriber's household is subscribed to a Lifeline service.

B. Eligibility Determination

PINNTEL's Lifeline customer enrollment will be in-person at customer outreach events by PINNTEL trained field representatives. PINNTEL will have a trained Regulatory Manager, who will monitor each enrollment, as well as a copy of its compliance manual present at customer outreach events.

If PINNTEL cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, PINNTEL's employees ("Company personnel") will review documentation establishing eligibility pursuant to the Lifeline rules.⁵ All Company personnel who interact with current or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These Company personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state- specific checklists.

⁵ See Lifeline Reform Order, ¶ 100; section 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B)

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.⁶ Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state, federal or Tribal program; (2) a notice letter of participation in a qualifying state, federal or Tribal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state, federal or Tribal program.

Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workmen's Compensation statement of benefits; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information for at least three (3) months.⁷

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria by checking the appropriate box on the application form. PINNTEL will not retain a copy of this documentation. PINNTEL will establish a log system which will identify the date and time of review of documents, and the documents or criteria reviewed to verify eligibility. Where Company personnel conclude that preferred documentation is insufficient to establish such eligibility, PINNTEL will deny the associated application and inform the applicant of the

⁶ See Lifeline Reform Order ¶ 101.

⁷ See Lifeline Reform Order, ¶ 101; section 54.410(b)(1)(i)(B)

reason for such rejection. In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to the Field Regulatory Manager or to the Corporate Regulatory Manager at PINNTEL's corporate headquarters.

De-Enrollment for Ineligibility. If PINNTEL has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, PINNTEL will notify the subscriber of impending termination in writing and in compliance with any state dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility. A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a completed and signed certification form. The customer will be instructed to contact PINNTEL corporate headquarters for resolution of enrollment eligibility issues.

C. Subscriber Certifications for Enrollment

PINNTEL will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.⁸ Every applicant will be required to complete an application/certification form containing disclosures, and collecting certain information and certifications as discussed below. Applicants that do not complete the form in person will be required to submit a completed and signed application/certification to PINNTEL by mail, facsimile, electronic mail or other electronic transmission, inclusive of the required proof of eligibility. Documentation submitted with the application/certification is used strictly to verify a consumer's eligibility to participate in the

⁸ Lifeline Reform Order, ¶ 61; section 54.410(a)

Lifeline program. Upon approval of the customer's application/certification, such proof of eligibility is either returned to the customer or destroyed, as previously stated in section I.B above. In addition, Company personnel will verbally explain the certifications to consumers when they are enrolling in person or over the phone.⁹

Disclosures. PINNTEL's application/certification forms will include the following disclosures: (1) Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.¹⁰

Application/certification forms will also state that: (1) the service for which the consumer is applying is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.¹¹

In addition, PINNTEL will notify the applicant that the Lifeline service must be personally activated by the applicant/subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.¹²

⁹ See Lifeline Reform Order, ¶ 123.

¹⁰ See Lifeline Reform Order, ¶ 121; section 54.410(d)(1).

¹¹ See section 54.405(c).

¹² See Lifeline Reform Order, ¶ 257.

Information Collection. PINNTEL will also collect the following information from the applicant in the application/certification form: (1) the applicant's full name; (2) the applicant's full residential address (P.O. Box is not sufficient); (3) whether the applicant's residential address is permanent or temporary; (4) the applicant's billing address, if different from the applicant's residential address; (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number (or the applicant's Tribal identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits; and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.¹³

Applicant Certification. Consistent with new rule section 54.410(d)(3), PINNTEL will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording, the following: (1) the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the applicant will notify PINNTEL within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, the applicant is receiving more than one Lifeline benefit, or another member of the applicant's household is receiving a Lifeline benefit; (3) if the applicant is seeking to qualify for Lifeline as an eligible resident of Tribal lands, that he or she lives on Tribal lands; (4) if the applicant moves to a new address, that he or she will provide that new address to PINNTEL within 30 days; (5) if the applicant provided a temporary

¹³ See Lifeline Reform Order ¶¶ 168-169; section 54.419.

residential address to PINNTEL, the applicant will be required to verify his or her temporary residential address every 90 days; (6) the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service; (7) the information contained in the applicant's application/certification form is true and correct to the best of the applicant's knowledge; (8) the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and (9) the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

In addition, the applicant will be required to authorize PINNTEL to access records required to verify the applicant's statements on the application/certification form and to confirm the applicant's eligibility for the Lifeline credit. The applicant must also authorize PINNTEL to release records required for the administration of the Lifeline credit program, including to USAC to be used in a Lifeline program database.¹⁴

D. Annual Verification Procedures

PINNTEL will annually re-certify all subscribers by querying the appropriate eligibility databases or obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the Commission's rules. This certification will include a confirmation that the applicant's household will receive only one

¹⁴ See Section 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide the consent will result in the applicant being denied Lifeline service.

Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.¹⁵ PINNTEL will notify each participating Lifeline customer annually that he or she must confirm his or her continued eligibility in accordance with the applicable requirements. Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline service and if the subscriber fails to respond, he or she will be de-enrolled from the program.¹⁶

PINNTEL will re-certify the eligibility of existing subscribers as of June 1, 2012 (as of June 1, 2012, PINNTEL had no Lifeline subscribers) and on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013. PINNTEL will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to retain their Lifeline benefits, when such Lifeline benefits may be terminated, and how to contact PINNTEL in response to the re-certification requirement.

Verification De-Enrollment. PINNTEL will de-enroll subscribers that do not respond to inquiries regarding the annual verification or fail to provide the required certification. PINNTEL will allow subscribers 30 days to respond to the initial annual verification inquiry. If the subscriber does not respond, PINNTEL will send a written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days from the date of the written notice, PINNTEL will de-enroll the subscriber within five business days.

¹⁵See Lifeline Reform Order, ¶ 120.

¹⁶See Lifeline Reform Order, ¶ 145.

E. Activation and Non-Usage

PINNTEL will not consider a Lifeline subscriber activated, and will not seek reimbursement for Lifeline service for that subscriber; until the subscriber activates PINNTEL's Lifeline service by affirmatively acknowledging that they are the applicant and that they have applied for and wish to receive Lifeline service from PINNTEL. This process is conducted in person at an outreach event site. If a customer attempts to make any call other than to 911 prior to activating or re-activating the service, the call will automatically be routed to PINNTEL's customer support line where Company personnel will ask the customer for appropriate verification information in order to activate the service. As mentioned earlier since most activation will occur at outreach event sites, this type of verification will not be a regular or necessary occurrence.

After service activation, if necessary, PINNTEL will provide a de-enrollment notice to subscribers that have not used their service for 60 days. Upon 60 days of non-use, PINNTEL will provide notice to the subscriber that failure to use the Lifeline service or provide other confirmation directly to PINNTEL that the subscriber wishes to retain their Lifeline service within 30-days from the date of the de-enrollment notice will result in de-enrollment from the Lifeline program.¹⁷ Subscribers can avert the de-enrollment process or continue to "use" the service by: (1) completing an outbound call; (2) purchasing additional non-Lifeline minutes from PINNTEL to add to the subscriber's plan; (3) answering an incoming call from a party other than PINNTEL; or (4) responding to a direct contact from PINNTEL confirming that the subscriber wants to continue receiving the service.¹⁸ In addition to the above, PINNTEL's usage team identifies accounts that have not been used for 30 days and sends a text message to such

¹⁷ See Lifeline Reform Order, ¶ 257; section 54.405(e)(3).

¹⁸ See Lifeline Reform Order, ¶ 261; section 54.407(c)(2).

customers asking the customers to respond to the text message or call PINNTEL's customer service number within 30 days to keep their account active. After 45 days of non-usage, PINNTEL's internal outreach team will attempt to contact the customer directly to inquire about the customer's intentions to retain the service.

If the subscriber does not respond to the notices as provided above, the subscriber will be de-enrolled from the Lifeline program and PINNTEL will not request further Lifeline reimbursement for the subscriber. PINNTEL will report annually to the Commission and any other authorities who require, the number of subscribers de-enrolled for non-usage by month.¹⁹

F. Additional Measures to Prevent Waste, Fraud and Abuse

To better ensure that customers understand the Lifeline service restrictions with respect to duplicates, PINNTEL will implement supplemental verification measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures include but are not limited to additional emphasis in written disclosures as well as live due diligence.

In addition to checking the National Lifeline Accountability Database contemplated in the *Lifeline Reform Order* (the "Database") when it becomes available, or supplemental databases that PINNTEL will subscribe to, Company personnel emphasize the "one Lifeline phone per household" restriction in their direct sales contacts with potential customers. Training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction. All Company personnel interacting with existing and potential Lifeline customers will undergo training regarding the eligibility and certification requirements in the *Lifeline Reform Order*

¹⁹ See Lifeline Reform Order, ¶ 261; section 54.407(c)(2).

and this Compliance Plan. Company personnel will sign and return to PINNTEL the Acknowledgement of Receipt of the training manual that they receive as part of this training.

All Company personnel must provide proof of employment eligibility (*e.g.*, driver's license or copy of W-9 form). All Company personnel must read, understand and follow PINNTEL's Code of Conduct. Each employee must have a signed copy of the Code of Conduct on file with PINNTEL in order to be allowed to enroll customers for PINNTEL. A toll-free hotline to a corporate representative and an email address that can be used for any issues or questions regarding Lifeline eligibility or prepaid services is provided to all Company personnel.

National Lifeline Accountability Database. When the Database becomes available, PINNTEL will comply with the requirements of new rule section 54.404. PINNTEL will query the Database to determine whether an applicant is currently receiving Lifeline service from another ETC and whether anyone else living at the applicant's residential address is currently receiving Lifeline service. In the interim, PINNTEL will subscribe to other database services that will assist in its efforts to determine Lifeline eligibility.

One-Per-Household. PINNTEL will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household through the use of its application/certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for Lifeline service, PINNTEL will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address. If so, and the applicant lives at an address with multiple households, PINNTEL will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the

Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (i.e., de-enrollment).²⁰ Further, if an applicant provides a temporary address on his or her application/certification form collected as described above, PINNTEL will verify with the applicant/subscriber every 90 days that the address provided in the application/certification remains valid.

Company personnel will inform each Lifeline applicant that they may be receiving Lifeline support under another name, will assist in the applicant's understanding of what constitutes "Lifeline-supported services," and help the applicant in determining whether they are already benefiting from Lifeline support, by informing the consumer that not all Lifeline services are currently marketed under the name Lifeline.

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, PINNTEL will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service, (2) Lifeline is a government assistance program, (3) Lifeline service is non-transferable, (4) only eligible consumers may enroll in the Lifeline program, (5) the Lifeline program is limited to one discount per household; (6) what documentation is necessary for enrollment; (7) PINNTEL's name; and (8) a statement informing consumers that willfully making a false statement in order to obtain the Lifeline benefit can be punished by fine, imprisonment or being barred from the program.²¹

²⁰ Lifeline Reform Order, ¶ 78.

²¹ See Lifeline Reform Order, ¶ 275; section 54.405(c).

These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in PINNTEL's Lifeline service offering, as well as PINNTEL's application/certification forms and annual re-certification forms. This specifically includes the Company's website (www.pinntel.com) and any outdoor signage. Samples of PINNTEL's marketing materials are included as Exhibit C.

G. Company Reimbursements from the Fund

To ensure that PINNTEL does not seek reimbursement from the Fund without a subscriber's consent, PINNTEL will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid application/certification and verification forms from each of the subscribers for whom it is seeking reimbursement.²² In addition, PINNTEL will keep accurate records as directed by USAC and as required by new section 54.417 of the Commission's rules.

H. Annual Company Certifications

PINNTEL will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that PINNTEL: (1) has policies and procedures in place to review consumers' proof of eligibility documentation and ensure that its Lifeline subscribers are eligible to receive Lifeline services;²³ (2) is in compliance with all federal Lifeline certification procedures;²⁴ and (3) has obtained a valid application/certification form for each subscriber for whom PINNTEL seeks Lifeline reimbursement.²⁵

²² See Lifeline Reform Order, ¶ 128; section 54.407(d).

²³ See Lifeline Reform Order, ¶ 126; *section 54.416(a)(1)*.

²⁴ See Lifeline Reform Order, ¶ 127; *section 54.416(a)(2)*.

²⁵ See Section 54.416(a)(3).

In addition, PINNTEL will provide the results of its annual re-certifications/verifications to the Commission, USAC, the applicable state commission and the relevant Tribal governments (for subscribers residing on Tribal lands) on an annual basis.²⁶ Further, as discussed above, PINNTEL will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.²⁷

PINNTEL will also annually report to the Commission, USAC, and relevant state commissions and the relevant authority in a U.S. territory or Tribal government as appropriate,²⁸ the Company name, names of PINNTEL's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.²⁹ PINNTEL will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.³⁰ Finally, PINNTEL will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that PINNTEL is able to function in emergency situations.³¹

²⁶See Lifeline Reform Order, ¶ 132,148; section 54.416(b).

²⁷See Lifeline Reform Order, ¶ 257; section 54.405(e)(3).

²⁸See *Lifeline Reform Order*, section 54.422(c).

²⁹See Lifeline Reform Order, ¶ 296, 390; section 54.422(a).

³⁰See Lifeline Reform Order, ¶ 390; section 54.422(b)(5).

³¹See Lifeline Reform Order, ¶ 389; section 54.422(b)(1)-(4).

I. Cooperation with State and Federal Regulators

PINNTEL has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, PINNTEL will:

1. Make available state-specific subscriber data, including the names and addresses of its Lifeline subscribers, to USAC and to each state public utilities commission where PINNTEL operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;³²
2. Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
3. Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline service from another carrier;
4. Immediately de-enroll any subscriber whom PINNTEL has a reasonable basis to believe is receiving Lifeline-supported service from another ETC or is no longer eligible to participate in the Lifeline program - whether or not such information is provided by the Commission, USAC, or a state commission.

II. Description of Lifeline Service Offerings

PINNTEL will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying providers, Sprint and Verizon Wireless. PINNTEL's Lifeline offering will provide customers with at least 250 anytime voice minutes per month, and text messaging at a rate of 3 texts per voice minute, at no charge. Lifeline customers can purchase additional bundles of minutes, referred to in PINNTEL's general terms and conditions as Replenishment plans.

³²PINNTEL anticipates that the need to provide such information will sunset following the implementation of the Database.

These Replenishment plans, or "top-up" minutes, are available for purchase at PINNTEL's website or through Customer Service. Where text messaging is not included in a plan as a separate component, it is available with all PINNTEL voice plans at the rate of three (3) texts, either sent or received, to one (1) minute of airtime usage. Additional information regarding PINNTEL's plans, rates and services can be found on its website at www.pinnatel.com.

In addition to free voice services, PINNTEL's Lifeline plan will include a free handset and custom calling features at no charge, including Caller ID, Call Waiting, Call Forwarding, 3-Way Calling, and Voicemail. All plans include domestic long-distance at no extra per minute charge. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.³³ The Compliance Plan Public Notice requires that carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding in any state.

³³ See Lifeline Reform Order, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

PINNTEL receives revenue from a number of sources which are completely independent from the revenue it receives in the form of Lifeline reimbursements. PINNTEL's revenue stream includes, in addition to its Lifeline service offerings, income from the sale of new O.E.M wireless handsets, and the distribution of refurbished FCC Compliant wireless handsets. PINNTEL as a wholly owned subsidiary of Pinnacle Group Holdings ("PGH") has access to funding from other companies operated by PGH. Each of the three companies owned by PGH operates independently and in independent marketplaces. Consequently, PINNTEL has not and will not be relying exclusively on Lifeline reimbursement for its operating revenues. PINNTEL will receive revenues from these wholesale and non-Lifeline retail offerings, and also has access to other financial resources including but not limited from its parent company. PGH has three wholly owned subsidiaries. General Solutions Associates d/b/a GSAssociates which operates as a regulatory and compliance firm to Telecommunications providers, currently serving over 120 clients. Pinnacle Advisory Group d/b/a Advastaff is a Temp to Perm employment service providing PEO services. Currently employing over 300 persons. Pinnacle Telecommunications Group d/b/a PINNTEL operates in two sectors of Telecommunications. Currently PINNTEL has designed and manufactures a low cost full featured handset for Lifeline providers to distribute to Lifeline customers in place of a refurbished device. PINNTEL looking to exploit its knowledge and experience in the telecommunications industry via GSAssociates and PINNTEL is seeking to enter the Lifeline ETC market. Together, the knowledge, experience, financial strength of PGH and its management team will insure that PINNTEL will remain financially viable as it enters the ETC marketplace as a provider.

The Company has not been subject to enforcement sanctions or ETC revocation proceedings in any state. PINNTEL holds a wireless resellers license in the state of Hawaii and is compliant with all Hawaii regulations as well Federal/USAC requirements.

Service Requirements Applicable to PINNTEL's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules." PINNTEL certifies that it will comply with the service requirements applicable to the support it receives.³⁴ PINNTEL provides all of the telecommunications services supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC. PINNTEL's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. PINNTEL's service offerings provide its customers with a set number of minutes of use for local service at no charge to the customer.

PINNTEL also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available, and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, PINNTEL will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

Finally, PINNTEL will not provide toll limitation service ("TLS"), which allows low income consumers to avoid unexpected toll charges. PINNTEL is a prepaid service provider, as such, customers cannot be disconnected for failure to pay toll charges, nor are there additional charges for exceeding their program minutes. Further, PINNTEL, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid

³⁴47 C.F.R. § 54.202(a)(1).

for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.³⁵

IV. Conclusion

PINNTEL submits that its Compliance Plan fully satisfies and in some cases exceeds the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, PINNTEL respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,



Jose L. Solana
GSAssociates
5400 Laurel Springs Parkway
Suite 404
Suwanee, GA 30024
(678) 304-6465
Regulatory Advisor to;
Pinnacle Telecommunications Group, LLC

June 22, 2012

³⁵ See Lifeline Reform Order, ¶ 230.

EXHIBIT A

PINNACLE GROUP HOLDINGS, INC.

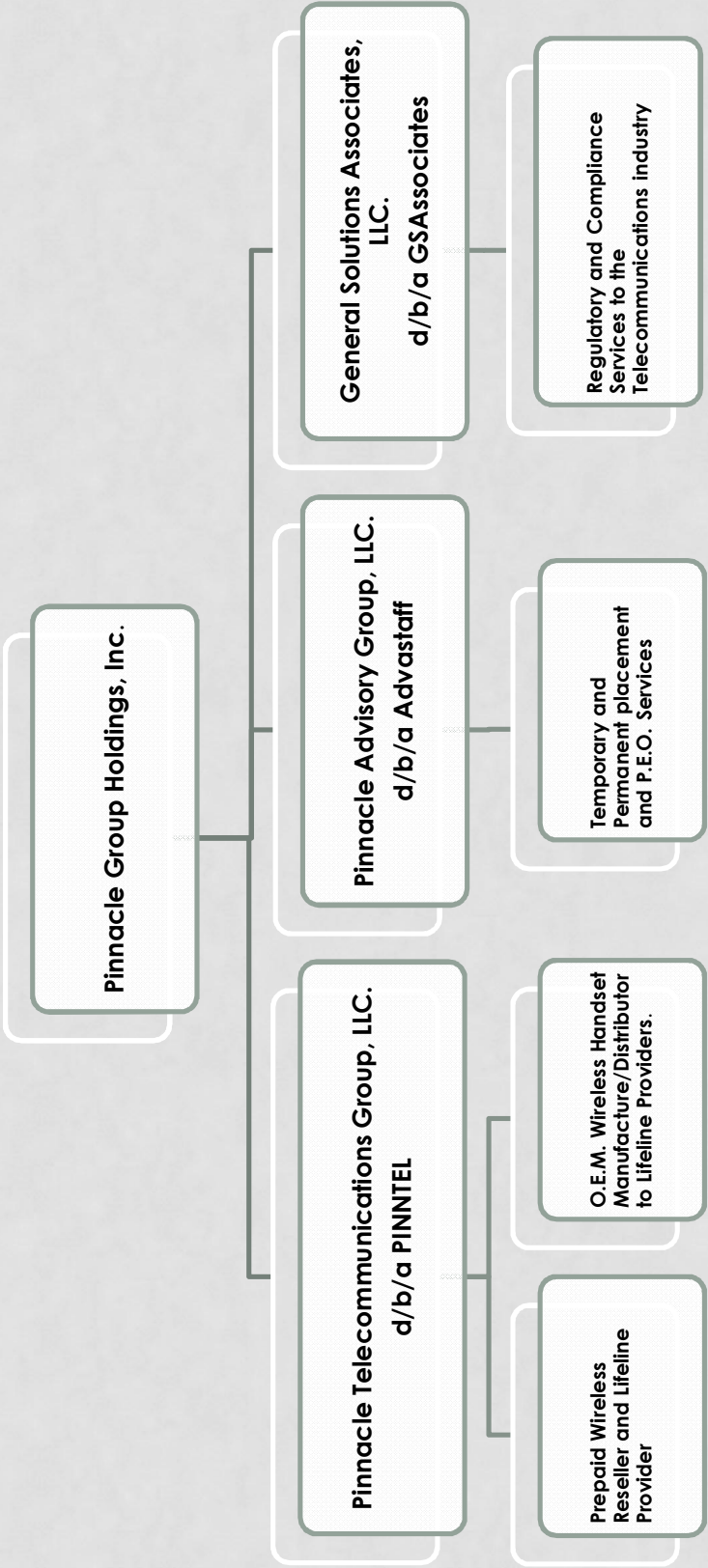


EXHIBIT B



(STATE) Wireless Lifeline Service Application

When completed mail or fax form to:
5400 Peachtree Parkway Suit 404
Suwanee, GA 30024
Fax 866-766-3591
Customer Service: 1-855-968-5433



A complete and signed Lifeline Application and Certification Form ("Application") is required to enroll your household in PINTEL Lifeline program in your state. This Application is only for the purpose of verifying your eligibility for the Lifeline service program and will not be used for any other purpose. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferrable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. All Lifeline subscribers must complete their own Application for service. Service requests will not be processed until this Application has been received and validated. Applicants must personally activate PINTEL Lifeline service by calling 1-855-968-5433 and selecting Option 2 for activations.

Lifeline benefits are federal benefits and Applicants that make false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment, de-enrollment or can be barred from the program. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communication Commission's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the United States government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that not all Lifeline services are currently marketed under the name Lifeline.

Each household will be required to verify continued eligibility for Lifeline program participation on at least an annual basis.

I (Applicant) participate in at least one of the following programs, and am able to verify my identity and participation as required:

PLEASE CHECK ONE

- | | |
|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP) |
| <input type="checkbox"/> Medicaid (<u>not Medicare</u>) | <input type="checkbox"/> National School Lunch Program's free lunch program (NSL) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of federal poverty level |

Evidence of program eligibility is required. Where such eligibility cannot be validated through a state and/or federal database or other alternative means, it may be validated in person by an Agent by providing a copy of the Applicant's state issued ID card and a copy of the program identification card or other social service agency documentation showing current participation.

I (Applicant) certify, under penalty of perjury that [check boxes]:

- ☐ I have read and understand this Application, and swear and affirm that the information contained in this Application is true and correct, to the best of my knowledge and belief. I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I further understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the above designated program(s) and will notify within (30) thirty (30) business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
- ☐ The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on this Application that I am required to notify PINTEL of my new address within 30 days.
- ☐ If I provided a temporary residential address to I will verify my temporary residential address every 90 days.
- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
- ☐ I authorize PINTEL to access any records required to verify my statements on this form and to confirm my eligibility for the Life line credit. I give permission to the duly authorized official(s) administering the above programs to provide to PINTEL my status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by PINTEL as confidential customer account information.

- ☐ I authorize PINNTEL to release any records required for the administration of the Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, my household is not currently receiving a Lifeline-supported service from any other provider.
- ☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).

Applicant's Signature: _____ Date: _____

Name: _____ D.O.B.: _____ Last 4 Digits of SSN: _____

Residence Address (*May not be a PO Box*): _____

- ☐ The address provided above is a temporary address. I will validate this address every 90 days until I obtain a permanent address.
- ☐ The address provided above is a Multi-Household residence.

City: _____ State: _____ Zip Code: _____

Mailing Address (if different than residence address): _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ E-mail address: _____

If Qualifying for Lifeline by Income, the Number of Individuals in My Household: _____.

I, _____, hereby attest that the Applicant's ID and supporting documentation checked below were presented and verified.
(Agent/Company Representative Name)

Agent/Company Representative Signature: _____ Date: _____

In order for your PINNTEL Lifeline account to remain active, we require that you use your Lifeline supported wireless service at least once per month.

You can use the service by completing an outbound call, purchasing minutes from PINNTEL to add to your plan, answering an incoming call from someone other than PINNTEL or responding to a direct contact from PINNTEL confirming that you want to continue receiving the service.

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):

Documents Acceptable Proof for Income-Eligibility (check 1):

- ☐ The prior year's state, federal, or Tribal tax return,
- ☐ Current income statement from an employer or paycheck stub,
- ☐ A Social Security statement of benefits,
- ☐ A Veterans Administration statement of benefits,
- ☐ A retirement/pension statement of benefits,
- ☐ An Unemployment/Workmen's Compensation statement of benefits,
- ☐ Federal or Tribal notice letter of participation in General Assistance, or
- ☐ A divorce decree, child support award, or other official document containing income information for at least three months time.

Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below):

List A - Choose 1

- ☐ Supplemental Nutrition Assistance Program (SNAP)
- ☐ Medicaid

- ☐ Section 8 Federal Public Housing Assistance (FPHA)
- ☐ Supplemental Security Income (SSI)
- ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP)
- ☐ National School Lunch Program's free lunch program
- ☐ **State Program 1**
- ☐ **State Program 2**

List B - Choose 1:

- ☐ Program participation card/document
- ☐ Prior year's statement of benefits
- ☐ Notice letter of participation
- ☐ Other official document evidencing participation

Applicant's Account Number	Corp ID/Dealer Number
Customer ESN	Customer MDN



(STATE) Wireless Lifeline Service Application

When completed mail or fax form to:
5400 Peachtree Parkway Suit 404
Suwanee, GA 30024
Fax 866-766-3591
Customer Service: 1-855-968-5433



A complete and signed Lifeline Application and Certification Form ("Application") is required to enroll your household in PINNTEL's Lifeline program in your state. This Application is only for the purpose of verifying your eligibility for the Lifeline service program and will not be used for any other purpose. Lifeline is a government assistance program and only eligible consumers may enroll in the program. Lifeline service is a non-transferrable service and therefore may not be transferred to any other individual, including another eligible low-income consumer. All Lifeline subscribers must complete their own Application for service. Service requests will not be processed until this Application has been received and validated by PINNTEL. Applicants must personally activate PINNTEL's Lifeline service by calling 1-855-968-5433 and selecting Option 2 for activations.

Lifeline benefits are federal benefits and Applicants that make false statements in order to obtain the Lifeline benefit can be punished by fine or imprisonment, de-enrollment or can be barred from the program. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. A household may not receive multiple Lifeline benefits from multiple providers. A violation of the one-per-household requirement constitutes a violation of the Federal Communication Commission's rules and will result in de-enrollment from the program, and could result in criminal prosecution by the United States government. The Lifeline benefit may be applied to either one landline or one wireless number, but cannot be applied to both. Note that not all Lifeline services are currently marketed under the name Lifeline.

Each household will be required to verify continued eligibility for Lifeline program participation on at least an annual basis.

Please indicate which Lifeline Program for which you qualify:

☐ Enhanced Lifeline

I (Applicant) hereby certify that **I am an eligible resident of Tribal Lands**, I participate in at least one of the following programs and am able to verify my identity and participation as required.

PLEASE CHECK ONE

- | | |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) | <input type="checkbox"/> Tribally Administered TANF (TATANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP) |
| <input type="checkbox"/> Medicaid (<u>not Medicare</u>) | <input type="checkbox"/> National School Lunch Program's free lunch program (NSL) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Head Start (meeting income qualifying standards) |
| <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA) | <input type="checkbox"/> Income at or below 135% of federal poverty level |

☐ Regular Lifeline

I (Applicant) participate in at least one of the following programs, and am able to verify my identity and participation as required.

PLEASE CHECK ONE

- | | |
|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) | <input type="checkbox"/> Low Income Home Energy Assistance Plan (LIHEAP) |
| <input type="checkbox"/> Medicaid (<u>not Medicare</u>) | <input type="checkbox"/> National School Lunch Program's free lunch program (NSL) |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Income at or below 135% of federal poverty level |

Evidence of program eligibility is required. Where such eligibility cannot be validated through a state and/or federal database or other alternative means, it may be validated in person by an Agent by providing a copy of the Applicant's state issued ID card and a copy of the program identification card or other social service agency documentation showing current participation.

I (Applicant) certify, under penalty of perjury that [check boxes]:

- ☐ I have read and understand this Application, and swear and affirm that the information contained in this Application is true and correct, to the best of my knowledge and belief. I understand that I must meet certain eligibility qualifications as described above to receive Lifeline assistance, and I further understand that providing false or fraudulent information to receive Lifeline benefits is punishable by law.
- ☐ I meet the income-based eligibility criteria for Lifeline service or am a current recipient of the above designated program(s) and will notify PINNTEL within thirty business days (1) if I am no longer participating in any of the above designated program(s); (2) if my household is receiving more than one Lifeline supported service; or (3) if for any other reason my household no longer satisfies the criteria for receiving Lifeline support. I have provided documentation of eligibility if required.
- ☐ The residence address provided below is my primary and permanent residence, and not a second home or business. I understand that if I move from the address included on this Application that I am required to notify PINNTEL of my new address within 30 days.
- ☐ If I provided a temporary residential address to PINNTEL, I will verify my temporary residential address every 90 days.

- ☐ I understand the notification requirements described above with respect to both program eligibility and current address information, and I further understand that I or my household may be subject to penalties if these requirements are not followed.
- ☐ I understand that I may be required to re-certify the continued eligibility of my household for participation in the Lifeline program at any time, but will be required to provide such recertification on at least an annual basis. I understand that failure to re-certify as required will result in the termination of Lifeline benefits. I further understand that I may be subject to the same penalties for providing false or fraudulent information at the time of recertification as are applicable to the initial application.
- ☐ I authorize PINNTEL to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline credit. I give permission to the duly authorized official(s) administering the above programs to provide my participation status in any of the above program(s). I give this permission on the condition that the information in this Application and any information about my participation in the above programs provided by officials be maintained by PINNTEL as confidential customer account information.
- ☐ I authorize PINNTEL to release any records required for the administration of the Lifeline credit program (including my name, telephone number and address), including to the Universal Service Administrative Company, to be used in a Lifeline database and to ensure the proper administration of the Lifeline Program. Failure to consent will result in denial of service.
- ☐ My household will receive only one Lifeline benefit and, to the best of my knowledge, **my household is not currently receiving a Lifeline-supported service from any other provider.**
- ☐ I am entitled to complete this Application, and am not listed as a dependent on another person's tax return (unless over the age of 60).

Applicant's Signature: _____ Date: _____

Name: _____ D.O.B.: _____ Last 4 Digits of SSN: _____

Residence Address (***May not be a PO Box***): _____

- ☐ The address provided above is a temporary address. I will validate this address with PINNTEL every 90 days until I obtain a permanent address.
- ☐ The address provided above is a Multi-Household residence.

City: _____ State: _____ Zip Code: _____

Mailing Address (if different than residence address): _____

City: _____ State: _____ Zip Code: _____

Contact Number: _____ E-mail address: _____

If Qualifying for Lifeline by Income, the Number of Individuals in My Household: _____.

I, _____, hereby attest that the Applicant's ID and supporting documentation checked below were presented and verified.

(Agent/Company Representative Name)

Agent/Company Representative Signature: _____ Date: _____

In order for your PINNTEL Lifeline account to remain active, we require that you use your Lifeline supported wireless service **at least** once per month.

You can use the service by completing an outbound call, purchasing minutes from PINNTEL to add to your plan, answering an incoming call from someone other than PINNTEL or responding to a direct contact from PINNTEL confirming that you want to continue receiving the service.

For Agent Use Only (check the appropriate boxes for the proof of eligibility viewed; do not copy or retain documentation):	
Documents Acceptable Proof for Income-Eligibility (check 1): <input type="checkbox"/> The prior year's state, federal, or Tribal tax return, <input type="checkbox"/> Current income statement from an employer or paycheck stub, <input type="checkbox"/> A Social Security statement of benefits, <input type="checkbox"/> A Veterans Administration statement of benefits, <input type="checkbox"/> A retirement/pension statement of benefits, <input type="checkbox"/> An Unemployment/Workmen's Compensation statement of benefits, <input type="checkbox"/> Federal or Tribal notice letter of participation in General Assistance, or <input type="checkbox"/> A divorce decree, child support award, or other official document containing income information for at least three months time.	<input type="checkbox"/> Section 8 Federal Public Housing Assistance (FPHA) <input type="checkbox"/> Supplemental Security Income (SSI) <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) <input type="checkbox"/> Low Income Home Energy Assistance Program (LIHEAP) <input type="checkbox"/> National School Lunch Program's free lunch program <input type="checkbox"/> Food Distribution Program on Indian Reservations (FDPIR) <input type="checkbox"/> Bureau of Indian Affairs General Assistance (BIA) <input type="checkbox"/> Tribally Administered TANF (TATNF) <input type="checkbox"/> Head Start (meeting income qualifying standards) <input type="checkbox"/> State Program 1 <input type="checkbox"/> State Program 2
Documents Acceptable Proof for Program-Eligibility (choose 1 from each list A and B below): List A - Choose 1 <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) <input type="checkbox"/> Medicaid	List B - Choose 1: <input type="checkbox"/> Program participation card/document <input type="checkbox"/> Prior year's statement of benefits <input type="checkbox"/> Notice letter of participation <input type="checkbox"/> Other official document evidencing participation
Applicant's Account Number	Corp ID/Dealer Number
Customer ESN	Customer MDN

EXHIBIT C



Get Free Mobile Phone Service Today
FROM PINNTEL Today. It's Your-Life^(sm)

PINNTEL brings FREE phone service to YOUR-LIFE(sm) today.

Would you like to receive free mobile phone service?
PINNTEL can bring it to you today. All you have to do is
call or click and we will let you know if you qualify. For
further details, turn to the back side of this postcard.



Primary Business Address
Address Line Two
Address Line Three
Address Line Four

phone: 555-555-5555
mobile: 555-555-5555
fax: 555-555-5555
email: someone@example.com

CALL or click today if you qualify:

If you participate in at least one of the following government subsidized programs you may qualify for Lifeline service. Lifeline eligibility is limited to one per household.

- Food Stamps
- National School Lunch's Free Lunch Program (NSL)
- Section 8 Federal Public Housing Assistance (FPHA)
- Medicaid
- Supplemental Security Income (SSI)
- Temporary Assistance for Needy Families (TANF)

Because it's YOUR-LIFE!



(855) YOU-LIFE, (855) 968-5433
www.pinintel.com/signup

Please
place
stamp
here

Primary Business Address
Address Line Two
Address Line Three
Address Line Four

phone: 555-555-5555
mobile: 555-555-5555
fax: 555-555-5555
email: someone@example.com

Mailing Address Line 1

Mailing Address Line 2

Mailing Address Line 3

Mailing Address Line 4

Mailing Address Line 5